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July 3, 2025

Via ECF

Hon. Sean H. Lane
United States Bankruptcy Court for the Southern District of New York
300 Quarropas Street
White Plains, NY 10601

Re: *In re Genesis Global Holdco, LLC*, Case No. 23-10063 (SHL)

Dear Judge Lane,

We write on behalf of the Wind-Down Debtors in the above-captioned proceedings (the “Chapter 11 Cases”) with regards to the deadline for the Wind-Down Debtors to file an objection (the “Objection Deadline”) to certain Administrative Expense Claims.¹ Pursuant to Article II.A. of the Amended Plan, the deadline for the Wind-Down Debtors to object to Administrative Expense Claims was set for no later than ninety (90) days after the Effective Date or such other date fixed by the Bankruptcy Court. As the Effective Date was August 2, 2024, *see Notice of (I) Occurrence of Effective Date for the Debtors’ Amended Joint Chapter 11 Plan and (II) Final Deadlines for Filing Certain Claims* (ECF No. 1907), the Objection Deadline was October 31, 2024.

On September 1, 2024, Genesis Global Trading, Inc. (“GGT”) filed three Administrative Expense Claims, claim number 1675 (“Claim No. 1675”), claim number 1678 (“Claim No. 1678”) and claim number 1680 (“Claim No. 1680” and together with Claim No. 1675 and Claim No. 1678, the “GGT Administrative Claims”). On October 31, 2024, the Wind-Down Debtors and counsel to GGT requested an extension of the deadline solely for the Wind-Down Debtors to file an objection to the three GGT administrative expense claims, from October 31, 2024 to December 6, 2024 (ECF No. 2057). On November 1, 2024, the Court granted this extension, *see Memorandum Endorsed Order Signed on 11/1/2024* (ECF No. 2058). On December 3, 2024, the Wind-Down

¹ Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in as defined in the *Debtors’ Amended Joint Chapter 11 Plan* (ECF No. 1874, and as it may be further amended and supplemented, the “Amended Plan”).

Debtors and counsel to GGT requested a further extension of the deadline solely for the Wind-Down Debtors to file an objection to the three GGT administrative expense claims, from December 6, 2024 to February 4, 2025 (ECF No. 2077). On December 4, 2024, the Court granted this further extension, *see Memorandum Endorsed Order Signed on 12/4/2024* (ECF No. 2078). On January 24, 2025, the Wind-Down Debtors and counsel to GGT requested a further extension of the deadline solely for the Wind-Down Debtors to file an objection to the three GGT administrative expense claims, from February 4, 2025, to April 5, 2025 (ECF No. 2102). On February 3, 2025, the Court granted this further extension, *see Memorandum Endorsed Order Signed on 2/3/2025* (ECF No. 2112). On April 3, 2025, the Wind-Down Debtors and counsel to GGT requested a further extension of the deadline solely for the Wind-Down Debtors to file an objection to the three GGT administrative expense claims, from April 5, 2025, to June 4, 2025 (ECF No. 2138). On April 7, 2025, the Court granted this further extension, *see Memorandum Endorsed Order Signed on 4/7/2025* (ECF No. 2141). On May 30, 2025, the Wind-Down Debtors and counsel to GGT requested a further extension of the deadline solely for the Wind-Down Debtors to file an objection to the three GGT administrative expense claims, from June 4, 2025 to July 9, 2025 (ECF No. 2157). On June 9, 2025, the Court granted this further extension, *see Memorandum Endorsed Order Signed on 6/9/2025* (ECF No. 2161). In light of ongoing discussions with GGT, and as agreed to by counsel to GGT, the Wind-Down Debtors respectfully request that the Court further adjourn the Objection Deadline solely with respect to the GGT Administrative Claims to August 8, 2025. The Wind-Down Debtors are available to answer any questions the Court may have.

Respectfully submitted,

/s/ Jane VanLare

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MEMORANDUM ENDORSED ORDER:
The requested extension is approved.
SO ORDERED.
Dated: July 9, 2025
/s/ Sean H. Lane
United States Bankruptcy Judge